

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

HERITAGE HOME GROUP, LLC, *et al.*¹

Debtors.

Chapter 7

Case No. 18-11736 (BLS)

(Jointly Administered)

ALFRED T. GIULIANO, in his capacity as
Chapter 7 Trustee of HERITAGE HOME
GROUP, LLC, *et al.*,

Plaintiff,

vs.

AKZO NOBEL COATINGS INC.,

Defendant.

Adv. Proc. No. 20-50766 (BLS)

**STIPULATION FURTHER EXTENDING DEADLINE FOR
DEFENDANT TO RESPOND TO THE COMPLAINT**

Plaintiff Alfred T. Giuliano, in his capacity as chapter 7 Trustee of Heritage Home Group, LLC, et al. (the “Plaintiff”) and Defendant Akzo Nobel Coatings Inc. (the “Defendant”) in this adversary proceeding, by and through their respective counsel, hereby stipulate and agree as follows:

1. On July 20, 2020, the Plaintiff filed the Complaint for Avoidance and Recovery of Preferential Transfers Pursuant to 11 U.S.C. §§ 547 & 550 (the “Complaint”) in the above captioned adversary proceeding against the Defendant.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s tax identification numbers, are: Heritage Home Group LLC (9506); HH Global II B.V. (0165); HH Group Holdings US, Inc. (7206); HHG Real Property LLC (3221); and HHG Global Designs LLC (1150). The Debtors’ corporate headquarters was located at 1925 Eastchester Drive, High Point, North Carolina 27265.

2. On September 11, 2020, the Parties filed a stipulation to further extend the time to answer the Complaint [Docket No. 5].

3. The deadline for the Defendant to answer, move or otherwise respond to the Complaint was scheduled for October 16, 2020.

4. The Plaintiff has agreed to give the Defendant an extension of approximately thirty (30) days so that the deadline for the Defendant to answer, move or otherwise respond to the Complaint shall be November 16, 2020.

5. This Stipulation is without prejudice to the rights of the parties to seek a further continuation of this deadline.

6. This Stipulation may be executed by facsimile and in any number of counterparts, each of which when so executed shall be deemed an original, but all such counterparts shall constitute but one and the same Stipulation.

Dated: October 9, 2020
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Andrew W. Caine (CA Bar No. 110345)
Peter J. Keane (DE Bar No. 5503)
Steven W. Golden (TX Bar No. 24099681)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
acaine@pszjlaw.com
pkeane@pszjlaw.com
sgolden@pszjlaw.com

*Counsel to Plaintiff, Alfred T. Giuliano, Chapter 7
Trustee for the Estates of Heritage Home Group, LLC,
et al.*

THOMPSON HINE LLP

/s/ Jonathan S. Hawkins

Jonathan S. Hawkins (OH Bar No. 0082860)

Jessica M. Kincaid (OH Bar No. 0095862)

Austin Landing I

10050 Innovation Drive, Ste. 400

Miamisburg, OH 45342

E-mail: Jonathan.Hawkins@thompsonhine.com

Jessica.Kincaid@thompsonhine.com

Counsel for Defendant